

Arthur Herring III
Pro Se
PO Box 43
Earlington, PA 18918
215.960.6229
Email: herthur20@protonmail.com

United States Bankruptcy Court
Eastern District of Pennsylvania

Arthur Herring III	:	No. 20-12141
Debtor	:	Chapter 7
	:	

Motion to Deny Summary Judgement to Plaintiff

INTRODUCTION

The lawsuit judgement, that is the reason for this bankruptcy by Debtor, is because for decades I have been exposing Nitv as a scam. Plaintiff and their two law firms, Desousa Law and Advisor Law, used the court as thugs to waste my money and to ruin my business. Plaintiff Nitv and the law firms used fraud to get their way. Those law firms knew the lawsuit was a fraud and admitted it, by accident, in their Complaint. The law firms also knew their client was a fraud by the thousands of documents they demanded be deleted on my business website and my news website. Rules dictating the actions of lawyers, in Pennsylvania and all the other states, dictate when lawyers know that, they must leave the case. Those lawyers stayed only because of the deep pockets of Nitv. The Plaintiff was exposed decades ago as committing fraud on law enforcement, public and the U.S. military by selling extremely unreliable "voice lie detectors" called Cvsa and made up training. Plaintiff uses large ads in law enforcement magazines and fake studies to convince buyers Cvsa is "98% accurate" as Nitv has claimed for 31 years. Various news media and the courts have proven Plaintiff's business is only a scam.

The following statements and Exhibits prove why Nitv must be denied Summary Judgement and must be included in the discharge. If Nitv does get Summary Judgement, Debtor's facts and Exhibits prove why any judgement to Plaintiff should only be \$1. A court's Summary Judgement for the full amount will be rewarding Plaintiff for committing fraud on the courts in Florida and Pennsylvania, using a made up lawsuit to ruin Debtor's life and having eliminating Debtor's 39 year business only so Plaintiff can have a bigger share of the market place for themselves for more money. Those tactics Nitv and their lawyers have used for decades to ruin other people.

1. I, Arthur Herring III, am acting as Pro Se in this Chapter 7 matter.
2. Debtor's lawyer, Nahrgang, had originally filed a response to Plaintiff's demand for Summary Judgement about five months ago.
3. Nahrgang quit on September 30, 2020 and had refused to include many important details and documents Debtor wanted to be filed with Nahrgang's response of objecting to Summary Judgement.
4. Debtor is now filing an additional set of facts and documents that are imperative to Debtor's defense.
5. Until the Florida's court's judgement against Debtor and his business in December 2019, Debtor had a 39 year business giving lie detection tests, selling and training various professionals worldwide in a system of lie detection called Voice Stress Analysis.

6. Debtor's business was called Dektor Corporation and the machine he used and sold was called PSE (Psychological Stress Evaluator).
7. Debtor was trained in PSE by the original inventors of the PSE in 1982.
8. The PSE was originally invented in 1969 by two former U.S. Army Colonels in Counter-Intelligence.
9. There are about 25 fake "voice lie detectors" sold today only to make money and whose accuracy are only about a coin toss, 50%.
10. Plaintiff and his business, Nitv, has been selling a very poorly made copy of the PSE called Cvsa (Computer voice stress analyzer) and their made up training for it since 1988. Cvsa is a software program in a laptop computer.
11. Since 1988, Plaintiff only sells to law enforcement types who use them mainly for lie detection testing in criminal cases. Plaintiff only sells to law enforcement types, not private sector, because Plaintiff knows that when Law enforcement realizes they bought worthless equipment, they will let Plaintiff keep the money as opposed to suing Plaintiff and risk being sued themselves for falsely accusing people.
12. Law enforcement includes police, sheriff, district attorneys, prisons, college police, probation departments, state and federal departments nationwide, including at one time the U.S. military.
13. Law enforcement buys Cvsa because of Plaintiff's claim Cvsa is "98% accurate" in their ads and website using made up studies and fake information. Plaintiff's website is www.cvsa1.com
13. Pennsylvania has 63 police departments and 6 district attorney office that bought Cvsa's and people trained to use them. Depending on the size of the department, 2-7 Cvsa's are bought per department. Nitv requires two people trained per Cvsa. Nitv claims 2,700 departments nationwide have bought Cvsa. Nitv does not post any names or contact information to verify their sales claims.
14. Millions of criminal cases have been ruined nationwide since 1988 and as many people falsely accused of crimes because Cvsa has no proven accuracy better than a coin toss.
15. Plaintiff has used various types of fraud and deception to sell Cvsa since 1988.
16. The deception includes Nitv owner, Humble, using a store bought title of "Dr" (Phd) to make people think he is a genius, made up studys to make people think Cvsa has "98% accuracy", hiring only ex-high level law enforcement types as instructors and sales men to convince other law enforcement to buy Cvsa, taking full page ads in law enforcement magazines with various types of lies about the Cvsa and Nitv.
17. For the past 8 years, Nitv has used a so-called "scientist" to travel nationwide promoting a made up study claiming Cvsa accuracy is "98%" to get Cvsa sales.
18. Nitv has many Nitv named businesses that use full names that imply they are part of the US government only to get sales.
19. Those names include Nitv Federal Services, Nitv Government Services, etc. Plaintiff has used the Great Seal (Eagle) of the U.S since 1988 as Plaintiff's personal logo to make people think Nitv is a part of the U.S. government. It is a felony to do so.

20. Nitv and Cvsa have been constantly documented in the courts and in the news media as being a fraud since 1988.
21. Each Cvsa is \$10,000 and \$1,400 per person to use them.
22. Plaintiff/lawyers constantly use the courts as weapons to waste people's money and to put them out of business since 1988.
23. Plaintiff/lawyers use federal lawsuits and threats of federal lawsuits to get their way in whatever matter they choose, including forcing news websites to delete facts proving Nitv/Cvsa is a fraud, getting a IT person's software for free, etc.
24. In January 2019, the Florida attorney general's office started an investigation on Nitv and its owners for fraud, mail fraud, wire fraud and cocaine smuggling from Panama where Nitv owner Humble has a house.
25. Plaintiff has been sued many times for fraud and other causes.
26. Plaintiff still owes almost \$1 million judgement from a lawsuit Nitv lost from 10 years ago for liable against a person called Baker.
27. Nitv has refused to pay Baker even though the Florida Supreme Court ruled they had to.
28. Nitv is being forced back to court again in November to reveal where they hid their assets from judgement.
29. About 5 years ago, Nitv/lawyers filed a federal lawsuit against Baker on made up charges only for revenge and to waste Baker's money on lawyer fees.
30. Several months ago, a major lawsuit was filed in Arkansas against Plaintiff Nitv for fraud.
32. Nitv was sued for fraud in 1999 and lost. Nitv admitted in federal court that Cvsa was not a lie detector. But, Nitv still continues to claim Cvsa is a lie detector using made up studys.
33. Plaintiff must be denied Summary Judgement because their entire lawsuit was based on fraud that Plaintiff's lawyers accidentally revealed in their lawsuit against Debtor.
34. Plaintiff must be denied Summary Judgement because Nitv/lawyers never proved any of their losses in court at the December damage hearing in Florida in December 2019.
35. Debtor was at the hearing and produced massive documents that Nitv/Cvsa was a fraud.
36. Plaintiff used their own CPA (Foyteck) at the damage hearing in the Florida in December 2019.
37. Plaintiff had used their other paid "experts" to claim Debtor had deliberately destroyed his hard drive to erase information during the lawsuit that was proven later to be false.
37. Foyteck only used a spreadsheet of 2,700 unverified "customers" of Nitv to determine Nitv claims of losses.
38. Those "customers" were labeled only as "Customer 1", "Customer 2", "Customer 3", etc.
39. A check on Nitv's website today still shows a Nitv chart containing only about 1,900 "customers", but NO contact information to prove even they are real buyers.

40. Foyteck admitted on stand he never received or asked for any contact information for those "customers" to prove Plaintiff's "customers" actually existed.
41. Foyteck based Nitv's "damages" only on Nitv's unverified documents and took Nitv's word that Nitv's "customers" and losses were real.
42. Foyteck admitted on stand that he could not show or prove that it was Debtor that caused any sales losses or if they were caused by all the news articles and court cases since 1988 that proved Nitv, Cvsa and owners were a fraud.
43. At the December 2019 damage hearing, Nitv claimed damages of about \$17 million.
44. At the December damage hearing, Plaintiff only produced one letter (Plaintiff still refuses to give me after numerous attempts by phone and email), from a law enforcement department who said because of information they learned on my Dektor website about Nitv, they would not buy any more Cvsa gadgets.
45. The judge used that one and only letter from that law enforcement department, then decided (without any proof) probably at least 10 other departments did not buy Cvsa because of information on my website and then doubled the damage award to \$850,000.
46. Plaintiff lawsuit was against Defendants Arthur Herring III and Defendant's business of 21 years Dektor Corporation in July 2018 in the federal court in Florida.
47. Despite Plaintiff's two law firms of Desousa Law and D'Loughy Law knowing from Defendant's deposition a month after the lawsuit was filed that Defendant had absolutely no ties to Florida in any way (personal or business), Plaintiff still deliberately wasted Debtors money on lawyer fees trying to send the lawsuit back to Pennsylvania where it belonged. As Debtor's money was running out, Debtor finally had to let the trial stay in Florida.
48. Plaintiff submitted many made up documents during lawsuit. They included a made up affidavit by a Nitv employee named Mosquera submitted in Federal court by Plaintiff's lawyers Desousa Law and D'loughy Law.
49. In their Complaint, Plaintiff lawyers took a paragraph from my Dektor website that I said ex-Nitv employees stated Nitv had been losing sales from law enforcement for many years because of the poor accuracy of the Cvsa.
50. Plaintiff's lawyers took my statement, put it in their Complaint and said my statement of losses of Cvsa sales were false, that Nitv had not lost any sales from law enforcement.
51. Based on Plaintiff's website, if Nitv only sells to law enforcement types and Plaintiff's lawyers state in their Complaint Nitv never lost any sales from law enforcement, because of me, then why did Nitv sue me for loss of sales and claim \$17 million in losses as Plaintiff's lawyers did at the December damage hearing??
52. Summary Judgement MUST be denied because Plaintiff lawyers accidentally admitted in their Complaint, their lawsuit was a complete fraud because Nitv had never lost any law enforcement sales.
53. Plaintiff knew their lawsuit was filed for the sole purpose of using the courts as weapons against Debtor (then Defendant) solely to bleed him dry and to eliminate his business, Dektor, only to keep the "voice lie detection" business all to Plaintiff as Plaintiff has done to many others for 30 years.
54. Plaintiff's lawyers knew their lawsuit was a complete fraud, they filed it and they kept it going only to make as much

money for themselves as possible because they had a client with extremely "deep pockets".

55. It has been estimated that the Nitv fraud has made about \$75 million over 30 years.
56. Plaintiff's lawyers knew Nitv was a criminal enterprise because those lawyers read my documents on my Dektor website and my news website www.nitvcvsaexposed.com.
57. After reading those documents, Plaintiff lawyers demanded my websites and other news websites delete all documents, including ABC New investigation story in 2006 proving Nitv, Cvsa and Humble were a fraud. Plaintiff threatened federal lawsuits against those if that information was not deleted.
58. Plaintiff lawyers knew from those documents that Nitv was a international criminal enterprise whose money was only made from the crime of fraud.
59. Since Nitv only makes their money from fraud, a felony, then ALL of the money Desousa Law and D'loughy Law has received from Nitv, is directly from Nitv's criminal activities.
60. Plaintiff's lawyers demanded and got from the judge a lifetime gag order banning me from ever saying or posting, in any way, anything that shows Nitv and Cvsa is a fraud.
61. Both Plaintiff's lawyers and the judge knew that order was a clear violation of my constitutional rights of freedom of speech and freedom of the press.
62. All information and documents posted by Debtor had already been in the public domain.
63. The judge, by imposing a lifetime gag order on me, is forcing me to be a "silent partner" and participant in Nitv's global fraud against law enforcement and the public.
64. Since Plaintiff's lawyers read those documents they wanted deleted, they knew Nitv was a criminal business and those lawyers should have quit under the rules for lawyers every state has.
65. Since Nitv . . . never had any independent study that proves Cvsa is any better in accuracy than a coin toss, then Nitv has been committing fraud for 31 years.
66. Because Plaintiff did not have any independent studies proving its claim of '98% accuracy,' as they have claimed for 30 years, in 2006 Nitv began to make up studies claiming Cvsa is "98% accurate".
67. The most famous made up study by Plaintiff claiming Cvsa accuracy is called the Chapman Study that was "released" in 2012.
68. The fact is, the Chapman study NEVER mentions Nitv or Cvsa at all.
69. The Chapman "study" is only a 14 page article about lie detection. Chapman worked at Nitv for 20 years before he died in 2011.
70. Nitv claims the Chapman "study" was published in a "scientific journal" called Criminalistics and Court Expertise, 2012 Annual Issue, #57.
71. It has been proven NO such journal exists anywhere.

72. Plaintiff has for 30 years used the courts as weapons to file many false lawsuits against both businesses and employees to waste Defendants money and to eliminate those defendants as businesses in the lie detection market.
73. Plaintiff usually always lose, but Plaintiff's objectives of wasting Defendants money and/or to put them out of business always is achieved.
74. Plaintiff has used lawyers and lawsuits as legal "thugs" to threaten people/businesses to get what Plaintiff wants from people and/or businesses.
75. In 2002, the U.S. military spent almost \$1 million to buy Cvsa's and training to be used in Iraq. After several years, the Cvsa was banned from the entire military because of its poor accuracy.
76. My actions, for 30 years, exposing Plaintiff and others selling fake lie detectors and their scams are that of a whistle blower.
77. Whistle blowers have protected the public from fraud and dangerous products and services that did or could have caused serious injury or death.
78. There are laws that protect whistle blowers from legal persecutions because they are an invaluable service serving the public.
79. As this court knows, Debtor hired bankruptcy lawyer Eisenberg and his daughter in May 2019 because I had run out of money for a lawyer in this lawsuit. Eisenberg and his daughter, with 75 years of bankruptcy law, knowing I did not have a regular income for several years, still filed the wrong type of bankruptcy. This court dismissed my claim and the trial went on for another 6 months as me as Pro Se spending about 6 hours a day on the lawsuit. If the Eisenbergs had filed the proper bankruptcy, I would not have this massive problem today and the huge losses I have incurred since that time, including the judgement.
80. Plaintiff claimed about \$17 million in damages at the December 2019 court hearing. But, the judge only gave them \$850,000 award and that was only after the judge doubled the amount he thought they had lost. Plaintiff and their CPA NEVER proved, with any factual data, they even lost that amount because of anything I said or did. Plaintiff only used assumptions and speculations to guess at a figure. CPA Foyteck admitted he never took into account any losses that were caused by the news media and the courts exposing the Nitv/Cvsa/owners scam for 30 years.

SUMMATION

The facts submitted above and the attached Exhibits proving those facts are why Plaintiff cannot have Summary Judgement. Nitv has used the federal courts for 30 years only as thugs to ruin people and destroy their businesses just to protect their scam. Plaintiff's scam has rewarded Plaintiff with about \$75 million so far of tax payer's money, ruined millions of criminal cases and as many people falsely accused of crimes.

To exclude Plaintiff from Debtor's discharge, if a discharge is granted by this court, would be a massive reward for Plaintiff's criminal actions of 30 years. Excluding Plaintiff, Debtor, at 67, would be forever punished by being forbidden to have a business, own vehicles, homes, bank accounts and many other normal parts of life because Plaintiff and their lawyers would seize them towards a never to be paid off judgement. A judgement amount that was NEVER proven in court with any verified documents, only what the Plaintiff claimed. That same Plaintiff who was conducting the scam and their lawyers who were greatly prospering from the thousands of billing hours at the expense of Debtor. This

massive judgement against Debtor for exposing a nationwide scam, for 30 years, on law enforcement, the public and the taxpayers who have paid for the fake "voice lie detectors" and the made up training that is sold with it. This massive scam that had been documented by various news media for 30 years.

Plaintiff and their lawyers have proven someone with money can use the courts anytime, in any way and in any state as thugs to protect their scam and destroy anyone who gets in their way. If this court gives Plaintiff Summary Judgement, it would be a reward to Plaintiff that they can financially prosper to the amount of \$850,000.

The facts also prove the lawyers for Plaintiff, Desousa Law, D'loughy Law and Weisgold Law are as much a part of Plaintiff's scam (See Exhibit #. From the documents Debtor has submitted and posted during the trial and in this bankruptcy, the lawyers for Plaintiff know Plaintiff is a criminal business, those lawyers greatly financially prospered from Plaintiff's scam and those same lawyers violated the rules of conduct for lawyers that every state has. Those rules include lawyers must excuse themselves on a case if they see that the case is based on fraud and for many other types of reasons.

Debtor's bankruptcy was only filed because of Plaintiff's lawsuit that was based completely on fraud and not for any reason caused by Debtor. Plaintiff's own lawyers stated in the Complaint that Plaintiff never lost any sales to Plaintiff's only type of customers: law enforcement. To repeat, since Plaintiff only sells to law enforcement and Plaintiff/lawyers stated Plaintiff never lost any sales from them as stated in Plaintiff's Complaint as the basis of Plaintiff's lawsuit, then Plaintiff/lawyers filed a lawsuit based only fraud because Debtor had never caused any loss of sales to Plaintiff. Plaintiff/lawyers have continued their lawsuit fraud now upon this bankruptcy court.

As I understand this matter, this court cannot reverse the decision of the Florida court. But, since the case was based solely of fraud, then this court, if it does give Summary Judgement, can reduce that judgement to \$1 since Plaintiff/lawyers admitted they never lost any money in sales from law enforcement. A judgement of only \$1 would send a clear message to Plaintiff/lawyers and for any the other fake lawsuits Plaintiff/lawyers may file in the future to ruin other people.

If Summary Judgement is denied, then Plaintiff will still be rewarded by getting many thousands of dollars from Debtor's cashiers checks, plus knowing Debtor wasted about \$35,000 on Florida lawyer fees on a fake lawsuit, wasting \$10,000 on bankruptcy lawyer fees now (with that lawyer quitting for no just reason), ruining Debtor's 39 year business of lie detection and two years of Debtors time.

Nitv and their lawyers do not have "clean hands" in this matter. It must be noted, nitv/lawyers did not act as professionals and contact me to discuss nitv's claims as lawyers always do before filing a lawsuit. The nitv lawyers had only one purpose at the direction of nitv: waste my money and put my 39 year business out of business so nitv would have a much bigger share of the lie detection market.

The following Exhibits prove why Plaintiff and their lawsuit on Debtor and his former business Dektor,were only a scam and why Plaintiff cannot be allowed to have a Summary Judgement of \$850,000 for life on Debtor based on Nitv's fraud.

Respectfully submitted,

Arthur Herring III
Pro Se
October 7, 2020

EXHIBITS

1. Nitv website stating Cvsa is only sold to law enforcement types, not the public.
2. Nitv lawyers taking a quote from my website where I said Nitv had a major drop in sales because the very poor accuracy of their Cvsa was getting around.

3. Nitv lawyers, Desousa and D'Loughy, said my statement was false and that Nitv never had a drop of law enforcement sales. If Nitv did not have any drop in sales to law enforcement, their only customers, then Nitv had no basis to sue me and claim I took millions of dollars in sales away from Nitv
4. Nitv's lawyers, Desousa Law and Advisor Law filed this affidavit when they filed the lawsuit claiming this person, Mosquera, "just happened" to see my website on the internet. Desousa and D'loughy used this affidavit to claim the lawsuit should be in Florida. Mosquera is a citizen of Florida and claimed no ties to Nitv. Those lawyers claimed the trial should be in florida, not Pennsylvania, where I have always lived. I never had any ties to Florida in any way. I found out shortly after the lawsuit was filed, Mosquera WORKED at Nitv for many years and he is the head of Latin America sales for Nitv. Nitv lawyers were never sanctioned by the judge for perjury or contempt for submitting this false document in a federal court.
5. Nitv hired their own CPA, Foyteck, to calculate losses that Nitv blamed on me exposing nitv as a fraud.
6. Foyteck ONLY used the spreadsheet data Nitv gave them. Nitv only listed their buyers as "customer 1, customer 2, etc. Foyteck admitted he NEVER got any contact information from Nitv to verify they were real buyers and other sales and customer data. Foyteck then made his statements of losses based only on incomplete, unverified information. Nitv claimed they had 2,700 buyers at the December 2019 damage hearing. Research has proven many buyers have stopped using cvsa because of its very poor accuracy.
7. The CURRENT chart of cvsa "buyer" on Nitv's website. They only add up to 1,903. Submitting false documents in court is fraud.
8. Judge Brannon's lifetime gag order on me and protecting Nitv's scam clearly violates my Constitutional rights of freedom of speech and freedom of press. Brannon is allowing Nitv to say anything they want about me, but I am not allowed to respond in any way.
9. Some of the many documents I had on my news website that Nitv demanded be deleted and Brannon agreed. Those documents had all been in the news, Nitv website and in the public domain for many years or decades.
11. Nitv owner Humble in 1988 convicted of copyright fraud.
12. Nitv owner Humble has claimed he is a "Dr" (PhD) since 1987. He wanted people to think he is a genius. Humble claims he invented the Cvsa. Facts proved he has no ability to invent anything of electronics or software. It has been proven for decades, in many news media and in the courts Humble only bought his "diploma" from a one room store calling itself Indiana Christian University, a business selling fake diplomas.
13. Humble holding his store bought, fake diploma of "Dr" of psychology. Humble has claimed it is a "honorary" degree, but why would he buy a diploma, from a one room store calling itself a university unless he knew he was going to use it as part of his scam a year later selling fake "voice lie detectors" and made up training to law enforcement and to the U.S. military.
14. Humble, as conmen do, create a complete image for themselves to sell their scam. About 2005, he created a massive website dedicated to himself at www.charleshumble.com Humble makes up many parts about himself, including he is a famous song writer. Facts prove those songs Humble claims he wrote were actually written by other people. That is called copyright fraud, something he was convicted of in 1988.

15. Because of my efforts, in 2005, ABC News did a major investigation on Nitv, Cvsa and humble exposing them as frauds. The full 16 minute video of it can still be seen on the internet.
16. A copy of some of my emails I sent to ABC News investigative reporter Brian Ross who did the Nitv/cvsa/humble investigation.
17. In 2011, the Vancouver Sun did a major, three part investigation exposing the Nitv, Cvsa, Humble scam.
18. In 2005, the Arizona Republic did a article exposing the Nitv, Cvsa, Humble fraud. Humble admits in the article there were no studies that proved Cvsa and training were accurate in any way for lie detection.
19. Because of my efforts, in 2019 the Florida attorney general's office opened an investigation on Nitv and Nitv's current owners of Charles Humble, his wife Lourdes, James Kane and his wife Olga (CFO) for fraud, mail fraud, wire fraud and cocaine smuggling from Panama where Humble has had a house for many years. The investigator I dealt with was Niemiec. This is a copy of some of the massive emails I sent Niemeic with documents. The AG deposed myself and about nine other former employees of Nitv.
20. Nitv has been sued many times because of the poor accuracy of the Cvsa. In May 2020, Nitv was sued for fraud in Arkansas.
21. After losing an almost \$1 million judgement to Baker for liable in about 2010 and still refusing to pay, Baker's lawyers demanded Nitv owners be deposed to reveal where Nitv's assets are for collection. About 5 years ago, nitv sued Baker for revenge only to waste his money, a tactic Nitv lawyers always use to shut people up or to ruin them financially. One, of the two, Nitv law firms suing me, Advisor Law, brags on his website he is an expert at hiding people's assets from lawsuit judgements.
22. Since 1988, nitv has used the Great Seal of the U.S. as their company logo and to make buyers think they are part of the U.S. government. It is a felony to use it that way with fines and prison. Nitv has various businesses with names such as Nitv Federal Services, Nitv Government Services, etc.
23. Nitv is implying all of those people in the picture are employees of nitv to make it look like nitv is a huge company. The fact is, nitv only has about 5 full time people. Their sales people and instructors are only paid on commission.
24. A major study was done on cvsa accuracy in 1995 by a highly educated law enforcement and military expert who bought a cvsa and was trained by nitv. His conclusion was cvsa accuracy was about a coin toss, about 50%.
25. On nitv's home page, it claims cvsa was scientifically validated to be 98% accurate.
26. Nitv had always claimed the cvsa was "98% accurate" for lie detection. They never had any independent studies proving so. The fact was, various studies found Cvsa was only about 50% accurate, only a coin toss. After "Dr" Humble (store bought title in 1987) and Cvsa was proven in 2005 as only a fraud, nitv/humble started to invent fake studies claiming Cvsa was "98% accurate". One such fake study is referred to as the Chapman study of 2012. Chapman worked for Nitv for 20 years before he died in 2011. The so-called "study" was only a 14 page article saying lie detection can be useful in investigations. The Chapman article NEVER mentions Nitv or Cvsa. So how can Nitv claim the study "proves" Cvsa is "98% accurate"? Nitv can't! Nitv uses the headlines of the Chapman article to trick people into thinking the "study" is real. The location where the Chapman article was supposed to be in a "scientific journal" called Criminalistics and Court Expertise, Annual Issue, #57". That "journal" does NOT exist anywhere!

It was also made up by Nitv to make the Chapman article look real so law enforcement would buy Cvsa. Since about 2012, Nitv has paid a person called Marigo Stathis to go around the country promoting the fake article to convince law enforcement to buy Cvsa.

27. On the Nitv website and in ads in law enforcement magazines, they promote the fake "Chapman Study" to get buyers.
28. Nitv/lawyer's Complaint even refers to the Chapman article as the "2012 peer reviewed study.....". A so called "study" that NEVER mentions Nitv or Cvsa at all.
29. Nobody has been able to find where the so-called publisher is located of the "journal", Criminalistics and Court Expertise. I contacted Nitv lawyer Desousa for about a year. He finally sent me a email saying Nitv does not know where it is located. If Nitv does not where the publisher of that journal is located, then how did their own employee, Chapman, of 20 years, know where to send his "study" for it to be published. Why didn't Nitv ever get copies of the journal for themselves. According to the page numbers at the bottom of Chapman's article, the journal would have had to be a book of about 250 pages.
30. Nitv/lawyers send letters all the time, using the courts as thugs, demanding various things of people or businesses Nitv does not like. If Nitv does not get what they want, they threaten law suits and sue just to waste people's money. They have sued their former employees. This is the 2003 letter sent to me by Nitv' lawyer Slavin threatening me with a lawsuit unless I delete all information on my website exposing Nitv as a fraud. I refused to do so and Nitv never sued.
31. In 2019, Nitv/lawyers sent a letter threatening to sue a 20 year news website and its owner Maschke unless they delete all his information and documents that proved Nitv/cvsa was a fraud. Maschke's lawyer sent them a very nasty reply and Nitv did not sue Maschke.
32. For over 20 years, Nitv sent out tens of thousands of emails, faxes and website postings with lies about myself, Dektor and PSE to take sales away from me. Nitv knew they could say anything they wanted that were lies, but other people did not have the money to sue them.
33. In 2016, Nitv's website lied about a police department, Groveport, dealings with my company. Groveport bought our equipment and sent 3 detectives to be trained. They all flunked the course because they got drunk every night. After they left, they contacted Nitv and Nitv said they would give them free Cvsa's if they agreed to say negative things about Dektor on Nitv's website to take sales away from Dektor.
34. One of Plaintiff's lawyers, Advisor Law, brags he can hide people's assets from lawsuit judgements. In other words, even if someone sues Nitv and spends a lot of money, the person will not be able to collect. Baker, who sued Nitv for liable and won almost \$1 million 10 years ago, still has not been able to collect. Recently, Nitv was ordered back to court to show where their assets are to pay Baker. See Exhibit 21.
35. A, B, C. Lawyers Desousa Law and Advisor Law knew their lawsuit was a fraud from the beginning because they admitted it in their original Complaint (Exhibits 1,2,3) and knew Mosquera was false (Exhibit 4) for the sole purpose of keeping their lawsuit in Florida, when it belonged in Pennsylvania. The lawyers knew their lawsuits only purpose was to help a conman by wasting other people's money and putting them out of business and to help them financially prosper. Even though Desousa and D'loughy are not licensed in Pennsylvania, they are working under the third lawyer in this case, Weisgold. As a lawyer, Weisgold is obligated to do his "Due Diligence" when he became involved in this case. All three lawyers are bound by the Rules for Lawyers in Pennsylvania. Desousa and d'loughy knew that the lawsuit was a fraud and were obligated, even under Florida's Rules, to withdrawl from the case. They

were obligated, even under Florida's Rules, not to take the case. They . did and continued with their fraud case and kept submitting false documents the lawyers knew were false to the court. The fake documents included CPA Foyteck's documents of claimed Nitv losses that the lawyers knew had never been verified as true. Foyteck even admitted at the December damage hearing he never got any contact information of Nitv's "buyers" to verify the "buyers" even existed. All of those lawyers must face the full legal actions of discipline by this court and not be allowed to have Summary Judgement. As of October 8, 2020, Desousa refuses to give me a document that Nitv presented at the damage hearing in December 2019 that the judge used to base the damages on.

- 36 A. Nitv sues anybody, including former, high level, law enforcement employees on made up claims just to waste their money and/or to put them out of business. In 2007, Nitv sued a business called Vipre. Vipre also sells fake "voice lie detectors". All Vipre owners used to work at Nitv as instructors or sales. According to the owner of Vipre, Their lawyer fees to defend themselves was about \$1.2 million. Vipre won, but they still lost all of that money. Nitv simply wrote it off on their taxes and got what they wanted: getting rid of a "competitor", just like they did with Dektor and myself.
- 36 B. Nitv does not hesitate to lie, cheat and steal. This includes their many, made up lawsuits, including mine. On a regular basis, Nitv hired a former military person and close friend of James Kane, co-owner of Nitv, to do various "dirty tricks" to harass and intimidate people Nitv does not like. "Dirty tricks" include following people, sending fake faxes and emails, sending letters to ex-Nitv employees claiming those people were fired for stealing, claiming they had child porn on their computer, etc.
37. One, of many, many ads, Nitv put in law enforcement magazines claiming their fake "Chapman Study" proved Cvsa was "98% accurate" for lie detection. As it has been proven, NOWHERE in Chapman's 14 page article does it ever mention Cvsa or even Nitv.
38. To add to Nitv's fake "voice lie detector" scam, about 12 years ago, Nitv made up a body language course for lie detection called AIS to sell to law enforcement. To this day, Nitv has NO studies that prove any accuracy for AIS .

Motion to Deny Summary Judgement will be electronically mailed to:

Dean Weisgold- dean@weisgoldlaw.com

James D'loughy- jdloughy@advisorlaw.com

Dan Desousa- ddesouza@desouzalaw.com